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August 14, 1995

**Response and Recommendations on
the Occupational and Residential
Exposure Assessment Summary
Report for NALED**

CASE NO.: 0092 NALED
EPA CHEMICAL NO.: 034401
EPA COMPANY NO.: 59639

Ms. Brigid Lowery
U.S. Environmental Protection Agency
SRRD/Office of Pesticide Programs [H7508W]
Room 33G6, Crystal Station I
2800 Crystal Drive
Arlington, VA 22202

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Dear Brigid,

Valent appreciated the opportunity to meet with members of the Naled Reregistration Team to discuss the Naled occupational and residential exposure assessment. As we stated during the meeting, Valent is interested in preserving the registered uses of Naled and protecting the people who handle or may be exposed to Naled.

Since our meeting on August 3, 1995, Valent has completed an in-depth written review of the occupational and residential exposure assessment and submits the enclosed response and recommendations. The enclosed report provides an analysis of the risk assessment assumptions, provides a revised risk characterization for handlers and post-application exposure and proposed mitigation for unacceptable margins of exposure.

Response to "Occupational and Residential Exposure Assessment and recommendations for the Reregistration Eligibility Decision for Naled" dated May 19, 1995. Authors Daniel P. Fay and Carmella Tellone, PhD, D.A.B.T.. August 14, 1995.

In summary, the report provides a more appropriate toxicity endpoint (8 mg/kg/day) and a more realistic dermal absorption factor (20%) for use in the risk characterization of naled. *Based on the revised risk assessment assumptions, Naled has acceptable margins of exposure for most mixer, loader, and applicator scenarios under the current Worker Protection Standards and has acceptable margins of exposure at a reentry interval of one day. Furthermore, California pesticide illness incident data support Valent's conclusion regarding the minimal risk of systemic toxicity concerns for handler and post-application exposure to Naled.*

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Naled (Case 0092)
Valent USA Corporation
August 14, 1995

Based on these recommendations, Valent encourages the EPA to revise the occupational and residential exposure risk characterization for Naled and its corresponding draft reregistration eligibility document prepared by the Health and Effects Division. If we can provide further information, please contact Dan Fay (510)256-2770 or me (202)872-4682.

To assist SRRD with internal discussions and meetings, Valent is providing a copy of the enclosed report on a floppy diskette. The report was created in WordPerfect 6.0 for Windows and the incident data spreadsheet was created in Lotus 123 for Windows. I hope you can access and use these files.

Best Regards,

Kelli D. Woodwick

Kelli D. Woodwick
Federal Registration Manager

cc: Beth Edwards, RD (Team 14)
Robert Forrest, RD (Team 14)
Larry Schnaubelt, SRRD
Walter Waldrop, SRRD